

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

LINDA FLINT EDGE,	)	
Plaintiff,	)	
	)	
v.	)	No. 04-12134 DPW
	)	
NORFOLK FINANCIAL CORPORATION	)	
and DANIEL W. GOLDSTONE,	)	
Defendants.	)	

**DECLARATION OF JOHN RODDY**

I, John Roddy, declare under penalty of perjury, as provided for by the laws of the United States, 28 U.S.C. §1746, that the following statements are true and correct:

1. I am a partner at Roddy, Klein & Ryan, in Boston, Massachusetts. I was admitted to the practice of law in Massachusetts in 1980. Prior to founding Roddy, Klein & Ryan (and its predecessors) in 1994, I was a partner at Schapiro, Hays & Roddy, in Boston. Virtually all of my private practice has involved litigation on behalf of consumers, representing individuals and classes injured by predatory lending, abusive debt collection and other unfair and deceptive business practices. My firm has obtained several hundred million dollars in restitution and debt forgiveness for consumers by successfully asserting federal consumer credit law claims on their behalf.

2. From 1980 -1987 I served as an Assistant Attorney General in the Massachusetts' Attorney General's Office. From 1980-1985, as an attorney in the Consumer Protection Division, I enforced state and federal consumer protection laws on behalf of affected Massachusetts consumers, including litigating approximately thirty class action type lawsuits involving unfair and deceptive business practices to successful conclusion. From 1986-1987 I was Legislative Counsel to the Attorney General, in the office's Executive Bureau.

3. For the past seven years I have co-chaired the Practising Law Institute's bi-coastal conference on consumer credit class action litigation, *Annual Institute On Consumer Financial Services Litigation*, held in New York, NY and San Francisco, California. I am a member of the Editorial Board of Advisors of the "Consumer Financial Services Law Report", a consumer law newsletter distributed by LRP Publications and a member of the Board of Directors of the Massachusetts Appleseed Center, a non-profit public interest law organization which seeks to develop law-related solutions to pressing social problems.

4. I have written and spoken extensively on consumer law, including class actions and the substantive and practical applications of Massachusetts and federal consumer protection law, for, among others, Massachusetts Continuing Legal Education, the Practising Law Institute and the National Consumer Rights Litigation Conference. In conjunction with the National Consumer Law Center and the Massachusetts Bar Association I have prepared written materials for and trained legal services and private attorneys in consumer credit law and litigation, focusing on the Truth in Lending Act and Fair Debt Collection Practices Act.

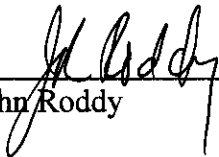
5. I know Yvonne W. Rosmarin from her work at the National Consumer Law Center (NCLC), where she was a staff member until she began a private practice in 1995, and subsequently, through activities of the National Association of Consumer Advocates (NACA), of which we are both members.

6. I am familiar with Ms. Rosmarin's knowledge, experience and qualifications in the area of consumer credit law and with the billing rates for lawyers with similar knowledge, experience and qualifications.

7. Ms. Rosmarin's hourly rate of \$325.00 falls well within the range of reasonableness. Her rate is not only reasonable, but may be on the low side of the scale for lawyers practicing in this area who possess similar qualifications and experience.

8. My own hourly rate is \$475.00. Fee applications containing this rate were approved in two recent nationwide consumer credit class action settlements, *In re Household Lending Litigation*, 02-1240-CW (N. D. Cal.) (April 30, 2004), and *Curry v. Fairbanks Capital Corporation*, 03-10875-DPW (D. Mass.) (May 12, 2004) and were described as reasonable in both cases by the supporting affidavit of Alba Conte, current author of *Newberg on Class Actions* (Shepard's/McGraw-Hill 4th ed. 2002), as well as *Attorney Fee Awards* (Shepard's/McGraw-Hill 2d ed. 1993). My opinion as to the reasonableness of Ms. Rosmarin's hourly rate is based on my qualifications and experience in the area of consumer credit law and litigation synopsized above.

Executed at Boston, Massachusetts this 17th day of May, 2005.

  
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John Roddy